1	PAUL ANDRE (State Bar No. 196585)			
	pandre@kramerlevin.com			
2	LISA KOBIALKA (State Bar No. 191404)   lkobialka@kramerlevin.com			
3	JAMES HANNAH (State Bar No. 237978)			
4	jhannah@kramerlevin.com AUSTIN MANES (State Bar No. 284065)			
5	amanes@kramerlevin.com			
6	KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road			
	Menlo Park, CA 94025			
7	7   Telephone: (650) 752-1700   Facsimile: (650) 752-1800			
8	1 acsimile. (030) 732-1600			
9	Attorneys for Plaintiff FINJAN, INC.			
10				
11	IN THE UNITED STATES DISTRICT COURT			
12	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
13	OAKLAND DIVISION			
14 15	FINJAN, INC., a Delaware Corporation,	Case No.: 4:18-cv-07229-YGR		
	Plaintiff,	DECLARATION OF AUSTIN MANES IN		
16	Tamuri,	SUPPORT OF PLAINTIFF FINJAN,		
17	v.	INC.'S ADMINISTRATIVE MOTION TO		
18	CISCO SYSTEMS, INC., a California	FILE DOCUMENTS UNDER SEAL		
19	Corporation,			
	Defendant.			
20	Detendant.			
21				
22				
23				
24				
25				
26				
27				



I, Austin Manes, declare as follows:

- 1. I am an attorney with the law firm of Kramer Levin Naftalis & Frankel LLP, counsel of record for Plaintiff Finjan, Inc. ("Finjan"). I have personal knowledge of the facts set forth in this declaration and can testify competently to those facts. I make this declaration in support of Finjan's Administrative Motion to File Documents Under Seal pursuant to Civil Local Rules 79-5(d) and 79-5(e).
- 2. I have reviewed the following documents and confirmed that they contain confidential information that Finjan has designated as "Highly Confidential Attorneys' Eyes Only" pursuant to the stipulated protective order in this litigation.

ECF or Ex. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Plaintiff Finjan, Inc.'S Opposition To Defendant Qualys Inc.'s Motion For Leave To Amend Answer And Affirmative Defenses	Page 1, lines 21-22; page 3, lines 8-12; page 7, lines 25-27; page 8, lines 1-9, 11- 21, 24-28; page 9, lines 1-5	This document reflects confidential license information that Finjan has designated as "Highly Confidential – Attorneys' Eyes Only" under the Protective Order
Ex. 5 to Declaration Of Aaron Frankel In Support Of Plaintiff Finjan, Inc.'s Opposition To Defendant Qualys Inc.'s Motion For Leave To Amend Answer And Affirmative Defenses	Excerpts from the e-mail chain "Finjan Licenses," showing Finjan's diligence in informing Qualys of its work in producing the Trend Micro Patent License Agreement	Page 1, July 19, 2019 message at ¶ 2, lines 5-7, ¶ 3, lines 1-3, ¶ 4 line 1; Page 2, July 19, 2019 message at ¶ 1, line 3, ¶ 2, line 1-2, June 4, 2019 message at ¶ 1, line 1, ¶ 2, line 1.	This document reflects confidential license information that Finjan has designated as "Highly Confidential – Attorneys' Eyes Only" under the Protective Order

3. Finjan requests leave to file these documents under seal because they contain or reference information that Finjan has designated as "Highly Confidential – Attorneys' Eyes Only."



I declare under the penalty of perjury under the laws of the United States of America that each of the above statements is true and correct. Executed on March 13, 2020, in Menlo Park, CA.

/s/ Austin Manes
Austin Manes

## **ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from any other signatory to this document.

/s/ James Hannah James Hannah

